The State of New Hampshire
Department of Environmental Services

Michael P. Nolin
Commissioner

June 14, 2006

CERTIFIED MAIL
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RETURN RECEIPT REQUESTED

LETTER OF DEFICIENCY
No. WMD 06-014

Global Wire USA
77 Anthony Street
Jewett City, CT 06531-2201

Attn: Rick Wells, President

Re: Montgomery Wire, Inc.
Littleton, New Hampshire
EPA ID # NHD986470730

Dear Mr. Wells:

On April 27, 2006, the Department of Environmental Services, Waste Management Division ("DES") conducted an inspection of Montgomery Wire, Inc. a subsidiary of Global Wire USA ("Montgomery"). The purpose of the inspection was to determine Montgomery's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules, Env-Wm 100-1100.

As a result of the inspection, the following deficiencies in Montgomery's hazardous waste management program were documented:

1. Env-Wm 502.01 - Hazardous Waste Determination

   At the time of the inspection, a formal hazardous waste determination had not been performed for the following:

   a. The calfran waste generated from the drawing machines ("Calfran Waste");
   b. The evaporator sludge generated from the evaporation of the Calfran Waste ("Evaporator Waste");
   c. The sodium hydroxide solids and filters ("NaOH solids");
   d. The two 3-gallon containers with unknown contents located behind the primary silver plating line ("3-gallon Containers");
   e. The two 10-gallon containers with unknown contents located behind the primary silver plating line ("10-gallon Containers");
   f. The 5-gallon container with unknown contents located beneath the second silver plating line ("5-gallon Container"); and
   g. Two (2) expired cylinders of 1 ppm hydrogen cyanide gas ("Cylinders").

Env-Wm 502.01 requires that all generators of waste determine if their waste is a hazardous waste. Waste determined to be hazardous must be handled pursuant to the requirements of the Hazardous Waste Rules.

(a) Calfran Waste: DES requests that Montgomery determine whether the Calfran Waste is a hazardous waste by testing a representative sample of the Calfran Waste.

The analyses should include, at a minimum, testing to detect the characteristic of toxicity, by using the Toxicity Characteristic Leaching Procedure (TCLP) for RCRA metals, specifically silver and cadmium, as described in Env-Wm 403.06.

Montgomery will need to provide DES with the results of the hazardous waste determination, along with any other supporting data, such as Material Safety Data Sheets (MSDS) and/or chemical analyses.

(b) Evaporator Waste: DES requests that Montgomery determine whether the Evaporator Waste is a hazardous waste by testing a representative sample of the Evaporator Waste.

The analyses should include, at a minimum, testing to detect the characteristic of toxicity, by using the TCLP for RCRA metals, specifically silver and cadmium, as described in Env-Wm 403.06.

Montgomery will need to provide DES with the results of the hazardous waste determination, along with any other supporting data, such as the MSDS and/or chemical analyses.

DES further requests that Montgomery provide the following information regarding the Evaporator Waste if it is determined that the Evaporator Waste is a hazardous waste:

(i) A written estimate of how long (*i.e.*, years and months) Montgomery has been disposing of the Evaporator Waste as an NH01 state regulated waste;

(ii) A written estimate of the quantity of Evaporator Waste disposed of during the time period reported in response to question (i);

(iii) The names of each destination facility which has received Evaporator Waste, as well as the relative quantities disposed of at each facility. Please include copies of the bills of lading or manifests used to ship the waste; and

(iv) An economic benefit analysis. In this case the economic benefit derived by Montgomery would be the cost of disposal had the Evaporator Waste been properly characterized as hazardous. Please provide the actual costs incurred by Montgomery for the management of the Evaporator Waste as an NH01 state regulated waste versus managing the Evaporator Waste as a hazardous waste. Please include the cost per pound for the disposal of the Evaporator Waste as an NH01 state regulated waste.

(c) NaOH Solids: DES requests that Montgomery perform an adequate hazardous waste determination on the NaOH solids. This determination should be made using analytical testing.

The analyses should include, at a minimum, the New Hampshire procedure for determining the corrosivity characteristic for non-aqueous corrosive waste (NH02), as specified in Env-Wm 403.04(b)(3).

Montgomery will need to provide the results of the hazardous waste determination, along with any other supporting data, including the results of the chemical analyses, to DES.

(d) 3-gallon Containers: DES requests that Montgomery determine whether the contents of the 3-gallon Containers are a hazardous waste by either applying knowledge of the hazardous properties of the contents of the 3-gallon Containers and/or by testing a representative sample of the contents of the 3-gallon Containers.

Should Montgomery analyze the contents of the 3-gallon Containers, the analyses should include, at a minimum testing to detect the characteristic of toxicity, by using the TCLP for RCRA metals, as described in Env-Wm 403.06, as well as testing to detect the characteristic of corrosivity, by using the method as described in Env-Wm 403.04(b).

Montgomery will need to provide to DES the results of the hazardous waste determination, along with any other supporting data, such as the MSDS and/or chemical analyses.

(e) 10-gallon Containers: DES requests that Montgomery determine whether the contents of the 10-gallon Containers are a hazardous waste by either applying knowledge of the hazardous properties of the contents of the 10-gallon containers and/or by testing a representative sample of the contents of the 10-gallon Containers.

Should Montgomery analyze the contents of the 10-gallon Containers, the analyses should include, at a minimum, testing to detect the characteristic of corrosivity, by using the method as described in Env-Wm 403.04(b)(3).

Montgomery will need to provide to DES the results of the hazardous waste determination, along with any other supporting data, such as the MSDS and the chemical analyses.

(f) 5-gallon Container: DES requests that Montgomery determine whether the contents of the 5-gallon Container is hazardous waste by either applying knowledge of the hazardous properties of the contents of the 5-gallon Containers and/or by testing a representative sample of the contents of the 5-gallon Containers.

Should Montgomery analyze the contents of the 5-gallon Container, the analyses should include, at a minimum, testing to detect the characteristic of corrosivity, by using the method as described in Env-Wm 403.04(b)(3).

Montgomery will need to provide to DES the results of the hazardous waste determination, along with any other supporting data, such as the MSDS and the chemical analyses.

(g) Cylinders: DES requests that Montgomery determine whether the contents of the Cylinders are a hazardous waste by either applying knowledge of the hazardous properties of the contents of the Cylinders and/or by testing a representative sample of the contents of the Cylinders.

In an e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that the manufacturer would not take the cylinders and that Veridium will remove the cylinders on June 5, 2006.

2. Env-Wm 507.01(a)(3) - Storage Requirements – Open Container

At the time of the inspection, the following containers of hazardous waste were not closed: See the attached Container Inventory ("Inventory").

(a) One (1) 55-gallon container labeled as "hazardous waste-sodium hydroxide solid" located near the air scrubber next to the nickel plating line;

(b) One (1) 10-gallon container of hazardous waste metal sludge (D006/D011) positioned in front of the 55-gallon drum of hazardous waste metal sludge (D006/D011) located in the multi-wire drawing storage area next to the evaporator;

(c) One (1) 3-gallon container of hazardous waste metal sludge (D006/D011) positioned in front of the 55-gallon container of hazardous waste metal sludge (D006/D011) located in the multi-wire drawing storage area next to the evaporator;

(d) One (1) 55-gallon container of hazardous waste wipes and filter paper (D006/D011) located in the single end wire drawing storage area ("Single HWSA");

(e) One (1) 55-gallon container of hazardous waste wipes and filters (D006/D011) located in the multi-wire drawing storage area next to the evaporator; and

(f) One (1) 55-gallon containers of hazardous waste Calfran Waste (NH01) located in the multi-wire drawing area.

Env-Wm 507.01(a)(3) requires generators to ensure that containers storing hazardous waste are closed at all times, except when waste is being added to or removed from the containers.

DES requests that Montgomery ensure that containers storing hazardous waste remain closed at all times, except when adding waste to or removing waste from the containers.

3. Env-Wm 507.02(a) - Storage Time Requirements

At the time of the inspection, the following containers stored in the main hazardous waste storage unit ("HWSA") were stored for greater than 90 days of the date when accumulation of the waste first began (see the attached Inventory):

(a) One (1) 10-gallon plastic container marked "hazardous waste-petroleum distillates" with an accumulation date of 6/4/04, indicating 692 days of storage time.

(b) One (1) 5-gallon plastic container marked "hazardous waste-petroleum distillates" with an accumulation date of 6/21/04, indicating 675 days of storage time.

(c) One (1) 5-gallon plastic container marked "hazardous waste-cadmium and silver" with an accumulation date of 5/21/04, indicating 706 days of storage time.

(d) One (1) 5-gallon metal container marked "hazardous waste-mercury switches" with an accumulation date of 6/12/04, indicating 684 days of storage time.

(e) One (1) 5-gallon plastic container marked "hazardous waste-spent sulfamic acid" with an accumulation date of 6/12/04, indicating 684 days of storage time.

Env-Wm 507.02(a) requires that hazardous wastes are shipped off-site within 90-days of the date when accumulation of the waste first began.

DES requested that Montgomery ensure that all hazardous wastes generated on-site are shipped off-site within a period of ninety (90) days or less, unless the hazardous waste is managed under the Satellite Storage Provision of Env-Wm 509.03.

In the e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that a hazardous waste pickup has been scheduled for June 5, 2006. ***Please submit a copy of the hazardous waste manifest to DES showing that these hazardous wastes have been shipped off-site to an authorized treatment, storage, or disposal facility.***

4. Env-Wm 507.03(a)(1)a. - Beginning Accumulation Date

At the time of the inspection, DES personnel observed nine (9) 55-gallon containers of hazardous waste sodium hydroxide (D002), stored in the HWSA that were not marked with beginning accumulation dates (see the attached Inventory). Additionally, eleven (11) 55-gallon containers of hazardous waste Calfran Waste (NH01) stored in the Single HWSA were not marked with the beginning accumulation date (see the attached Inventory).

Env-Wm 507.03(a)(1)a. requires that all containers used for the storage of hazardous waste are marked with the beginning accumulation date at the time they are first used to store hazardous wastes.

DES requested that Montgomery properly mark all containers of hazardous waste with the beginning accumulation date at the time they are first used to store hazardous waste.

In the e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that on April 28, 2006, all containers of hazardous waste had been dated. No further action is required.

5. Env-Wm 507.03(a)(1)d. - Container Marking

At the time of the inspection, one (1) 5-gallon container marked "hazardous waste-petroleum distillates" stored in the HWSA was not marked with the EPA or state waste number (See the attached Inventory).

Env-Wm 507.03(a)(1)d. requires that all containers used for the storage of hazardous waste be marked with the EPA or state waste number at the time they are first used to store hazardous wastes.

DES requested that Montgomery properly mark all containers of hazardous waste with the EPA or state waste number at the time they are first used to store waste.

In the e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that all containers of hazardous waste have been properly labeled. No further action is required.

6. Env-Wm 507.03(a)(2) – Storage Requirements

At the time of the inspection, the label of two (2) 5-gallon satellite containers stored in the Quality Assurance satellite storage area had labels that were obscured by the wall (see the attached Inventory).

Env-Wm 507.03(a)(2) requires that all containers used for the storage of hazardous waste have labels that are not hidden by walls or other containers.

DES requests that Montgomery ensure all containers used for the storage of hazardous waste have labels that are accessible for viewing.

7. Env-Wm 509.02(a)(1) - Inspection Requirements

A review of Montgomery's Hazardous Waste Inspection Checklist ("Checklist") revealed that Montgomery had not documented the inspections of the HWSA and the single end drawing storage area for 31 out of the 52 required weekly inspections during the last year; however, the required inspections had been performed since December 5, 2005. Additionally, Montgomery's Checklist did not include the name of the inspector.

Env-Wm 509.02(a)(1), which references 40 CFR 265.15, General Inspection Requirements, requires full quantity generators to conduct and document inspections of the facility, including the hazardous waste storage area(s). Per 40 CFR 265.15(d), the inspection records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions taken.

DES requests that Montgomery ensure that weekly inspections of each hazardous waste storage areas are completed and recorded in an updated Checklist. DES also requests that Montgomery amend the existing Checklist to include the name of the inspector.

8. Env-Wm 509.02(a)(2) - Personnel Training

A review of Montgomery's personnel training program revealed the following deficiencies:

(a) Carl Hoffman and Simon Farjoun, the alternate emergency coordinators, had not received initial hazardous waste training and/or taken part in annual reviews in 2001, 2002, 2003, 2004, and 2005.

(b) The training records also failed to document a training program which includes a list of hazardous waste job titles, job descriptions, and names of employees filling each position.

Env-Wm 509.02(a)(2), which references 40 CFR 265.16, Personnel Training, requires full quantity generators to maintain a personnel training program. This includes, but is not limited to, ensuring that initial training and annual reviews are conducted for personnel handling hazardous waste, and requires full quantity generators to maintain specific documents and records related to personnel training. 40 CFR 265.16(b) also requires facility personnel to complete the program of training within six months of employment or assignment to a new position.

DES requests that Montgomery conduct and document hazardous waste training and annual reviews for all employees who have hazardous waste responsibilities and ensure that training is completed within six months of employment or assignment to a new position.

DES also requests that Montgomery maintain a written personnel training program which provides a description of the type and amount of introductory and continuing training that is given to persons filling each hazardous waste related position, and documentation of hazardous waste job titles, job descriptions, and names of employees filling each position. Please submit a copy of the written personnel training program to DES.

9. Env-Wm 509.02(a)(3) - Requirements for Ignitable and Reactive Wastes

At the time of the inspection, Montgomery had not posted a "No Smoking" sign near the HWSA, which is used to store ignitable wastes.

Env-Wm 509.02(a)(3), which references 40 CFR 265.17, requires that generators post a "No Smoking" sign wherever there is a hazard from ignitable or reactive waste.

DES requested that Montgomery post a "No Smoking" sign at the HWSA.

In the e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that "No Smoking" signs are visibly in place. No further action is required.

10. Env-Wm 509.02(a)(4) - Preparedness and Prevention

At the time of the inspection, adequate aisle space was not provided for two (2) 55-gallon containers of hazardous waste Calfran Waste (NH01) located in the Single HWSA. Env-Wm 509.02(a)(4), which references 40 CFR 265.35 requires that generators must maintain required aisle space at each hazardous waste storage area. Required aisle space is further defined in Env-Wm 509.02 (e) to mean not less than 2 feet of aisle space to allow for inspection of at least one side of each container.

DES requested that Montgomery maintain the required aisle space for each container of hazardous waste at the Single HWSA.

In the e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that the drums in the Single HWSA have adequate aisle space. No further action is required.

11. Env-Wm 509.02(a)(4) – Preparedness and Prevention

At the time of the inspection, Montgomery failed to maintain the required spill control equipment and decontamination equipment within 100 feet of the HWSA.

Env-Wm 509.02(a)(4), which references 40 CFR 265.32, requires generators to have required equipment, including spill control equipment, and decontamination equipment. Required equipment is further defined in Env-Wm 509.02(f) to mean the equipment required at each hazardous waste storage area, not more than 100 feet from each area, accessible along a clear path.

DES requested that Montgomery maintain the required spill control and decontamination equipment within 100 feet of the HWSA.

In the e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that spill control equipment had been placed in the HWSA. No further action is required.

12. Env-Wm 509.02(a)(5) - Contingency Plan

At the time of the inspection, Montgomery's contingency plan was confirmed to be incomplete. Specific deficiencies are listed in the attached Contingency Plan Module.

Env-Wm 509.02(a)(5), which references 40 CFR 265, Subpart D, requires full quantity generators to maintain a complete contingency plan at the site.

DES requests that Montgomery revise and update its contingency plan to correct any deficiencies as identified in the enclosed Contingency Plan Module and submit a copy of the plan to the local authorities and to DES.

13. Env-Wm 509.02(b) - Emergency Posting

At the time of the inspection, the emergency posting at the telephone nearest to the HWSA and Single HWSA failed to document the location of fire extinguishers, spill control material, and alarms.

Env-Wm 509.02(b) requires that full quantity generators post a list of the steps to take if an emergency occurs and the following emergency numbers and information at the nearest telephone to the hazardous waste storage area:

(a) The emergency coordinators (home and office);

(b) The fire department, police department, and State of New Hampshire and local emergency response teams that may be called upon to provide emergency services, unless the facility has a 24-hour response team designated to provide emergency services whose number is posted; and

(c) The location of fire extinguishers and spill control material, and if present, fire and internal emergency alarms.

DES requests that Montgomery post the required information at the telephone nearest to each hazardous waste storage area.

14. Env-Wm 509.03 - Satellite Storage

At the time of the inspection, Montgomery was handling one (1) 55-gallon container of hazardous waste "cyanide die box solution- F007/D003/D006/D011" located in the second silver plater as a satellite storage container. According to Edwin McLeod, the "cyanide die box solution" from the primary silver plater is emptied into the 55-gallon container of the same waste stream located at the second silver plater. The location of this container did not meet the definition of "at or near the point of generation" (See the attached Inventory).

Env-Wm 509.03 requires that all satellite storage containers be located at or near any point of generation where the wastes initially accumulate and be under the control of the operator of the process generating the waste.

DES requests that Montgomery manage the container of hazardous waste "cyanide die box solution" located at the second silver plater according to the requirements of Env-Wm 509.02 (*i.e.,* full storage area regulations). Alternatively, Montgomery may manage the container at the point of generation according to the requirements of Env-Wm 509.03.

15. Env-Wm 509.03(e) - Requirements for Incompatible Wastes

At the time of the inspection, Montgomery had stored containers of acids and sulfides, and acids and bases adjacent to each other in the Quality Assurance satellite storage area.

Env-Wm 509.03(e), which references 40 CFR 265.177(c), requires that full quantity generators ensure that incompatible wastes stored in nearby containers be separated or protected from other wastes by means of a dike, berm, wall or other device.

DES requested that Montgomery manage incompatible wastes to ensure that these wastes are separated or protected from other wastes by means of a dike, berm, wall or other device.

In the e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that incompatible wastes have been segregated. No further action is required.

16. Env-Wm 509.03(g) - Satellite Storage Container Marking

At the time of the inspection, one (1) 10-gallon container and one (1) 3-gallon container of hazardous waste metal sludge in front of the 55-gallon container of hazardous waste metal sludge (D006/D011) in the multi-wire drawing area next to the evaporator were not marked with the words "hazardous waste" and words that identify the contents of the containers.

Additionally, one (1) 2.5-gallon container of hazardous waste cyanide in the plating laboratory was not marked with the words "hazardous waste" and one (1) 5-gallon container stored beneath the second silver plater was not marked with words that identified the contents of the container.

Env-Wm 509.03(g) requires that at the time the satellite storage container(s) is first used to store wastes, the hazardous waste container(s) is marked with the words "hazardous waste" and words that identify the contents of the container(s).

DES requested that Montgomery properly mark all hazardous waste satellite storage containers at the time they are first used to store waste with the words "hazardous waste" and words that identify the contents of the container.

Montgomery personnel marked the 2.5-gallon container of cyanide waste in the plating laboratory with the words "hazardous waste" at the time of the inspection.

In the e-mail dated May 3, 2006, from Montgomery, Edwin McLeod, Engineering Manager, stated that all satellite containers have been labeled. No further action is required.

17. Env-Wm 807.06(b)(7) - Standards for Generators of Used Oil

At the time of the inspection, Montgomery had not completed a used oil determination for its used oil that was being managed as a "used oil for recycle."

Env-Wm 807.06(b)(7) requires generators to conduct an initial used oil determination by analyzing it for all of the parameters specified in Env-Wm 807.02 and Env-Wm 807.03 (exclusive of PCB's if no source of PCB's is present).

DES requests that Montgomery conduct an initial used oil determination for the parameters outlined in Env-Wm 807.02 and Env-Wm 807.03; and provide the results of the used oil determination to DES.

18. Env-Wm 1102.03 and Env-Wm 1112.04 - Universal Waste Lamp Management

At the time of the inspection, four (4) containers of universal waste lamps located in the boiler room were not marked with the words "Universal Waste – Lamps," "Waste Lamp(s)," or "Used Lamp(s)." See the attached Inventory.

Env-Wm 1112.04 requires universal waste handlers of lamps to ensure each universal waste lamp or container(s) holding universal waste lamps to be clearly labeled or marked with any of the following: "Universal Waste – Lamps," "Waste Lamp(s)," or "Used Lamp(s)."

DES requests that Montgomery clearly label or mark universal waste lamps and container(s) holding universal waste lamps with any of the following: "Universal Waste – Lamps," "Waste Lamp(s)," or "Used Lamp(s)."

19. Env-Wm 1102.03(c)(1) - Universal Waste Lamp Management

At the time of the inspection, three (3) containers of universal waste lamps located in the boiler room were not closed. See the attached Inventory.

Env-Wm 1102.03(c)(1) requires universal waste containers to be closed, except when universal waste is being added to or removed from the container.

DES requests that Montgomery ensure that all containers of universal wastes are closed, except when universal waste is being added to or removed from the container.

The April 27, 2006 inspection revealed that Montgomery generates contaminated cloth wipers from maintenance and cleaning operations. According to Edwin McLeod, the wipers are collected for laundering by an outside contractor (E & R Cleaners). Inspectors observed Montgomery's storage of contaminated wipers in the Bartells area and the maintenance area. At the time of the inspection, the collection containers in both areas were not closed and were not marked with the words "Contaminated Wipers for Laundering." Inspectors advised Mr. McLeod that contaminated wipers, generated at the facility, are subject to the DES Environmental Fact Sheet #WMD-HW-6, "Contaminated Cloth Wipers for Laundering" (See enclosed). DES requests that Montgomery comply with the fact sheet by ensuring that containers of contaminated cloth wipers are properly marked and remain closed.

DES believes the remaining portion of the cited deficiencies can be corrected and a report describing the corrective measures taken by Montgomery can be submitted within thirty (30) days of receipt of this letter. Supporting documentation that describes the measures taken to achieve compliance should be included with the report.

In the event compliance is not achieved within this period, DES may take further action against Montgomery including issuing an order requiring that the deficiencies be corrected, initiating an administrative fine proceeding, and/or referring the matter to the New Hampshire Department of Justice for imposition of civil penalties. In addition, DES personnel may re-inspect your facility at a later date to determine whether the facility has come into, and is maintaining, full compliance with the applicable rules. Fines may be pursued for any or all violations observed during this or subsequent inspections of the facility.

The written report as requested above should be addressed as follows:

Tammy Calligandes, Waste Management Specialist
DES/WMD
P.O. Box 95
Concord, NH 03302-0095

Enclosed you will find a copy of the completed Hazardous Waste Generator Inspection Report which documents the compliance status of your facility at the time of the inspection. This report may also be of value to you for use in determining future compliance with the New Hampshire Hazardous Waste Rules.

The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at http://www.des.state.nh.us/hwcs/, or by contacting the Public Information Center at (603) 271-2975.

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment, and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the meantime, if you have immediate questions about pollution prevention, please feel free to contact her at 271-6398.

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline, which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff is available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets of specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM at (1-866) HAZ-WAST (in-state only) or (603) 271-2942.

Should you have any questions regarding this letter, please contact the lead inspector, Tammy Calligandes, or Tod Leedberg, RCRA Compliance Supervisor, at 271-2942. Thank you for your cooperation.

Sincerely,

COPY

John J. Duclos, Administrator
Hazardous Waste Compliance Bureau
Waste Management Division

cc: DB/RCRA/LOD/Archives
Gretchen Hamel, Administrator, DES Legal Unit
Anthony P. Giunta, P.G., Director, WMD/ Paul L. Heirtzler, P.E., Esq., Administrator, WMP
Gene Gagne, Montgomery Wire, Inc.
Edwin McLeod, Montgomery Wire, Inc.

ec: JJD/SD

Enclosure: Hazardous Waste Generator Inspection Report